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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
HELENA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHAWN MATTHEW RUSSELL,

Defendant.

**CR 10-13-H-BMM**

**DEFENDANT RUSSELL'S  
UNOPPOSED MOTION FOR  
EARLY TERMINATION OF  
SUPERVISED RELEASE**

**MOTION**

Defendant Shawn Matthew Russell (Mr. Russell), by and through his undersigned counsel, Michael Donahoe, and the Federal Defenders of Montana, respectfully moves this Court to terminate his supervised release pursuant to 18 USC §3583(e)(1) and Federal Rules of Criminal Procedure 32.1(c)(2)(B) and (C).

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## **GROUND**

Mr. Russell has successfully served over 9 years of his 10-year term of supervised release, and he is no longer in need of supervision. The interest of justice is thereby served by releasing Mr. Russell from supervised release early.

## **GOVERNMENT'S AND PROBATION OFFICER'S POSITIONS**

Ryan G. Weldon, Assistant United States Attorney, has been contacted regarding this motion. The United States take no position and defers to the Court's discretion. Mr. Russell's supervising probation officer, Kade Henderson, has also been contacted. He indicated that Mr. Russell has remained in complete compliance with his supervised release and that he would be able to inform the Court that Mr. Russell has made great changes in his life. Mr. Henderson does not oppose the remaining term of Mr. Russell's supervised release terminating early.

## **CONCLUSION**

WHEREFORE, based on this motion and the brief that supports it, Mr. Russell prays the Court will terminate his remaining term of supervised release. A brief in support of this motion is filed contemporaneously.

RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of November 2022.

/s/ Michael Donahoe  
MICHAEL DONAHOE  
Deputy Federal Defender  
Federal Defenders of Montana

**CERTIFICATE OF SERVICE**  
**L.R. 5.2(b)**

I hereby certify that on November 7, 2022, a copy of the foregoing document was served on the following persons by the following means:

  1         CM-ECF

  2         Mail

1.     CLERK, UNITED STATES DISTRICT COURT

1.     RYAN G. WELDON  
       Assistant U.S. Attorney  
       U.S. Attorney's Office - Missoula  
       101 East Front Street, Suite 401  
       Missoula, MT 59802  
       Counsel for the United States of America

2.     SHAWN MATTHEW RUSSELL  
       Defendant

/s/ Michael Donahoe  
FEDERAL DEFENDERS OF MONTANA